

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA**

**Case No. 1:25-cv-22786-ELA**

DINNTECO INTERNATIONAL, S.L., an entity of Andorra la Vella,

Plaintiff,

v.

CAPITOL ELECTRONICS SALES, INC, an Indiana corporation; EMP DEFENSE, LLC, a Michigan limited liability company; SEAHAWKE MARINE INC, a Florida corporation; RIPPING IT OUTDOORS LLC, a Florida limited liability company; and JAY BHARAT KOTHARI d/b/a EMP Solutions, an individual residing in the state of Florida,

Defendants.

**PLAINTIFF'S NOTICE OF JOINT LIABILITY OF DEFENDANTS**

Plaintiff, Dinneco International, S.L., by and through undersigned counsel, in response to this Court's September 3, 2025, Order setting the procedure with respect to defaulted Defendant, Seahawke Marine Inc. ("Seahawke"), hereby files its Notice of Joint Liability of Defendants and states:

1. Plaintiff's First Amended Complaint, filed July 31, 2025 [D.E. 26] asserts, *inter alia*, claims of patent infringement under 35 U.S.C., § 1101 *et seq.*, against all Defendants, including Seahawke.
2. The infringement claims against all Defendants involve the same patent: United States Patent Number 9,685,775, entitled "VARIABLE ELECTRIC FIELD BALANCING DEVICE."
3. On September 11, 2025, three of the Defendants (Capitol Electronics Sales, Inc.; EMP Defense LLC; and Jay Bharat Kothari) filed a Combined Motion to Dismiss the First

Amended Complaint [D.E. 45], which establishes their intent to contest and defend against Plaintiff's claims on infringement. Specifically, Defendants contend that the product offered for sale and/or sold by all Defendants (a lighting suppressor identified in the First Amended Complaint) does not infringe Plaintiff's patent.

4. Because of the challenge by these Defendants of Plaintiff's infringement claim, the possibility of inconsistent liability exists between Defendants should the Court enter a default judgment at this time against Seahawke. Accordingly, Plaintiff does not seek the entry of a default judgment against Seahawke at this time.

5. Once the issue of infringement is resolved, Plaintiff shall seek the entry of default judgment against Seahawke.

Dated: September 17, 2025

/s/ Elio F. Martinez, Jr.

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*Attorneys for Plaintiff  
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**CERTIFICATE OF SERVICE**

I hereby certify that on September 17, 2025, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that a true and correct copy of the foregoing document was served via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing on all counsel or parties of record on the Service List below.

*/s/ Elio F. Martinez, Jr.* \_\_\_\_\_

Elio F. Martinez, Jr.